

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

ALLEN J. HANSON,
Plaintiff

v.

**STATE OF RHODE ISLAND DEPARTMENT
OF CORRECTIONS, *et al.*,**
Defendants

C.A. No. 1:17-cv-00598-WES-PAS

MOTION TO AMEND SCHEDULING ORDER

Defendant, State of Rhode Island, Department of Corrections ("RIDOC" or the "State") hereby moves to amend the scheduling order by extending the discovery closure dates by six (6) months, as follows:

- All factual discovery will be closed by May 4, 2022.
- Plaintiff shall make expert witness disclosures as required by Fed. R. Civ. P. 26(a)(2) by June 4, 2022.
- Defendant shall make expert witness disclosures as required by Fed. R. Civ. P. 26(a)(2) by July 4, 2022.
- All expert discovery will be closed by August 4, 2022.
- Dispositive motions shall be filed by September 4, 2022.

As grounds for this motion and in support thereof, the State avers that this matter has been referred to mediation pursuant to the Court's Alternative Dispute Resolution plan and the parties are in the process of scheduling dates for mediation. Moreover, the additional time requested is necessary to conduct additional factual discovery. As such, the State respectfully request that this motion be granted.

Respectfully Submitted,

STATE OF RHODE ISLAND,
DEPARTMENT OF CORRECTIONS,
By:

PETER F. NERONHA
ATTORNEY GENERAL

/s/ Justin J. Sullivan

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CERTIFICATE OF SERVICE

I hereby certify that on Friday, February 4, 2022 I caused a copy of the within document to be electronically filed and served through the CM/ECF filing system, which is available for electronic downloading and viewing, on all attorneys of record, who are as follows:

Stacey P. Nakasian, Esq.
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/s/ Justin J. Sullivan